

ORIGINAL



EX PARTE OR LATE FILED

RECEIVED

AUG 20 1999

August 20, 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**EX PARTE PRESENTATION**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-A325  
Washington, D.C. 20554

RE: *In the Matter of Deployment of Wireline Services Offering Advanced  
Telecommunications Capability; CC Docket No. 98-147*

Dear Ms. Salas:

On August 18, 1999 Alan Sampson, Aaron Vineyard, Nancy Yim, Betty Slackman, Mark Russell, John McDonald and the undersigned representing SBC met via conference call with Jerry Stanshine, Stagg Newman, Mike Jacobs, Vincent Paladini, Staci Pies, Doug Sickel, and Margaret Egler representing the Policy Division of the CCB and the Office of Engineering and Technology to discuss issues in the above referenced docket.

The SBC representatives discussed SBC's recommended criteria (attached) for determination of "Sucessfully Deployed" and "Significantly Degraded" in a line sharing environment. In addition, the SBC representatives presented an overview of the Selective Feeder Separation methodology.

Please include this letter and attachments in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

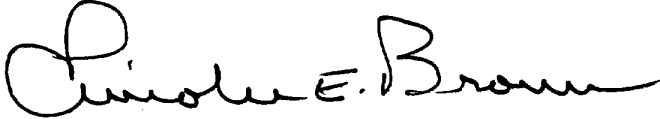
No. of Copies rec'd 041  
List ABCDE

August 20, 1999  
Ms. Salas  
Page 2

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew E. Brown". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Enclosures

Cc: Jerry Stanshine  
Vincent Paladini  
Stagg Newman  
Staci Pies  
Mike Jacobs  
Doug Sickel  
Margaret Egler

## Policy Recommendation:

### Successfully Deployed:

An advanced service is deemed successfully deployed as intended by the FCC order 99-48 if it has met the following four conditions:

1. The CLEC has a minimum of 200 of these advanced technology circuits deployed.
2. A minimum of 5% penetration level of the advanced service technology is deployed in a single 25, 50 or 100 pair sheath and that other narrowband and broadband tariffed or other approved, deployed technologies co-exist free of the following:
  - Service complaints introduced by this non-standard advanced circuit.
  - Provisioning constraints that prohibit or limit the assignment of tariffed or other approved and deployed narrowband or broadband technologies.
3. The advanced services technology should be deployed a minimum of 90 days with no spectrum interference related trouble reports or complaints from end users or other carriers. Further, if spectrum interference related reports arise, the deploying carrier must remedy the trouble condition and provide the technical explanation of the trouble resolution.
4. The CLEC provide sufficient information relative to the electrical characteristics of the proposed non-approved or non-standard advanced service technology prior to making a request for an unbundled loop.

To emphasize, this definition only applies to technologies that do not have a national standard or have not been approved by any state commission or FCC. If a carrier requests an unbundled loop to deploy an advanced services technology that has a national standard, or has been approved by another state commission or FCC, then SBC must allow deployment of that technology unless SBC can demonstrate that the new technology will significantly degrade the network or existing services.

### Significantly Degrade:

Significantly degrading a service should include:

1. Causing that service not to work as described in the tariff.
2. Causing that service not to work as described in the contract or agreement with the customer.
3. Materially reducing the distance over which the service can be provided (*i.e.*, significantly reducing its availability and reach to prospective or existing customers).
4. Materially interfering with or precluding the provisioning of other tariffed or other approved narrowband services.
5. Materially reducing the distance over which *other* advanced services that comply with existing industry standards can be provisioned in adjacent pairs contained in the feeder and distribution plant of the non-standard advanced service.
6. Materially reducing the remaining spectrum so as to preclude the provisioning of tariffed or other approved narrowband or broadband services.